

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**CHRISTINE GILLAM, *et al.*,  
on behalf of themselves and all  
Individuals similarly situated,**

**Plaintiffs,**

**v.**

**Civil Action No. 3:18cv00473-REP**

**DAN KOETTING, *et al.*,**

**Defendants.**

**DECLARATION OF DAN KOETTING**

I, Dan Koetting, declare as follows:

1. I make this declaration based upon personal knowledge, and if called and sworn as a witness, I could and would competently testify to the matters set forth in this declaration.
2. I am the founder and chief executive officer of Rockhill Consulting Group, LLC (“Rock Hill”).
3. I am a resident of California.
4. I do not own any property in Virginia.
5. I do not regularly travel to Virginia.
6. Rock Hill is a limited liability limited corporation organized under the laws of the State of Delaware.
7. Rock Hill’s principal place of business is located in San Diego, California.
8. Rock Hill’s only office is located in San Diego, California, and its day-to-day activities take place in San Diego California.
9. All documents related to Rock Hill’s operations are located at its office in San Diego, California.
10. Rock Hill has no offices in Virginia.

11. Rock Hill has no employees in Virginia.
12. Rock Hill has no officers or directors in Virginia.
13. Rock Hill does not market its services, solicit business, or advertise in Virginia.
14. Rock Hill does not communicate with any Virginia consumers.
15. I have not personally met, contacted, spoken with, or had any interactions of any kind with any Virginia consumers or the named Plaintiffs in the above captioned matter.
16. Rock Hill is not a lender.
17. Rock Hill has never advertised consumer loans products, never offered consumer loan products, never been a counterparty on consumer loan products, including as to Plaintiffs, and has never collected debts owed on consumer loan products.
18. In August 2013, Rock Hill agreed to provide management consulting and loan-related services to Big Lagoon Rancheria, a federally-recognized Indian tribe. Those services were provided to Big Lagoon Rancheria in connection with its tribal-lending entity, Green Gate Services, LLC ("Green Gate"). Rock Hill is no longer providing such services to Green Gate. Rock Hill provided no such services to co-Defendant Clear Loan Solutions, LLC ("Clear Loan"), and Rock Hill has no relationship with Clear Loan.
19. Rock Hill has no record of the following Plaintiffs receiving any loan from Green Gate: Christine Gilliam or Denis Geter.
20. Neither Rock Hill nor I own any interest in Green Gate or any other business owned or operated by the Big Lagoon Rancheria.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: September 5, 2018

By:   
Dan Koetting